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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,  
  
Individual and Representative Plaintiffs,  
  
v.  
  
META PLATFORMS, INC., a Delaware  
corporation,  
  
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE  
IN SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO CONSIDER  
WHETHER ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED RE: MOTION FOR  
LEAVE TO FILE FOURTH AMENDED  
CONSOLIDATED COMPLAINT [DKT. 659]**

1 I, Michelle Woodhouse, hereby declare:

2 1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I  
3 provide this Declaration based on my personal knowledge and/or after a reasonable investigation  
4 of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

5 2. Pursuant to Civil L.R. 79-5(f)(3), I make this Declaration in support of Plaintiffs’  
6 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (Dkt. 636)  
7 (“Motion”).

8 3. For the reasons detailed herein, Meta seeks leave to file under seal portions of certain  
9 documents filed by Plaintiffs in support of Plaintiffs’ Motion.

Document	Sealing Request
Woodhouse Exhibit A – Ex. 1 to Stein Declaration	Redacted portions
Woodhouse Exhibit B – Ex. 2 to Stein Declaration	Redacted portions
Woodhouse Exhibit C – Exhibit 3 to Stein Declaration	Redacted portions
Woodhouse Exhibit D – Exhibit 4 to Stein Declaration	Redacted portions
Woodhouse Exhibit F – Exhibit 9 to Stein Declaration	Redacted portions
Woodhouse Exhibit G – Exhibit 10 to Stein Declaration	Redacted portions
Woodhouse Exhibit H – Exhibit 11 to Stein Declaration	Redacted portions
Exhibit 12 to Stein Declaration	Entirety
Woodhouse Exhibit J – Exhibit 13 to Stein Declaration	Redacted portions

21 4. Meta seeks the Court’s permission to file under seal discrete portions of the  
22 following exhibits, as further explained below.

23 5. **Meta Employee PII.** Meta respectfully requests the Court’s permission to redact  
24 limited portions of **Woodhouse Exhibits F, G, H, and J** that reflect employees’ personal  
25 identifiable information (PII), namely, the email addresses and associated usernames for Meta’s  
26 individual employees, who are not parties to the case. Such information has been redacted to protect  
27 employee privacy and to avoid the risk of third parties’ unauthorized and/or illicit use of the  
28 information, such as for automated or unwanted solicitation or contact. Meta has previously

1 requested to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-1  
2 ¶ 5; Dkt. 409-1 ¶¶ 3, 7–8, 10), which this Court has granted, (*e.g.*, Dkt. 393; Dkt. 414). In addition,  
3 Meta has previously sought to file **Woodhouse Exhibit H** with the same redactions proposed here,  
4 (ECF 391-1 ¶¶ 3-6, ECF 391-8), which the Court granted (ECF 393).

5       6.     **Meta’s Cybersecurity Information.** Meta respectfully requests the Court’s  
6 permission to redact limited portions of **Woodhouse Exhibits F, H, and J**, that reflect hyperlinks,  
7 file paths, and certain file names (*e.g.*, links to access Meta’s internally stored documents and data),  
8 which point to Meta’s confidential and proprietary information and sensitive features of its internal  
9 systems. Meta further respectfully requests the Court’s permission to redact limited portions of  
10 **Woodhouse Exhibits A-D**, which reflect account numbers and specific Amazon Web Services  
11 EC2 instance identification numbers. These materials are maintained with restricted access in the  
12 ordinary course of Meta’s business and are not generally known to the public or Meta’s competitors.  
13 Disclosure of this confidential and proprietary information about Meta’s infrastructure may  
14 increase the risk of cybersecurity threats or breaches as third parties may seek to gain access to and  
15 use the information to compromise and intrude upon Meta’s internal systems and other confidential  
16 information. Accordingly, hyperlinks, file paths, file names, account numbers, and EC2 instance  
17 identification numbers have been sufficiently redacted to mitigate these risks. Meta previously  
18 requested to seal documents based on the same concerns regarding network security, (*e.g.*, Dkt.  
19 391-1 ¶ 9), which this Court has granted, (*e.g.*, Dkt. 393). In addition, Meta has previously sought  
20 to file **Woodhouse Exhibit H** with the same redactions proposed here, (ECF 391-1 ¶¶ 3-6, ECF  
21 391-8), which the Court granted (ECF 393).

22       7.     Further, for the same reasons as set forth in paragraph 6, Meta respectfully requests  
23 the Court’s permission to keep the entirety of **Woodhouse Exhibit I** under seal. Woodhouse  
24 Exhibit I is a 5-gigabyte native .tar file, which contains more than 80,000 individual log files. While  
25 Meta has not reviewed each of these files individually, numerous exemplary files reviewed contain  
26 file paths, filenames, and hostnames for internal Meta systems. As it would be impractical to  
27 attempt to redact each of these 80,000 files, Meta requests the Court seal Woodhouse Exhibit I in  
28

1 its entirety. I further understand that Plaintiffs have not actually filed Woodhouse Exhibit I, but  
 2 rather plan to submit it to the Court on a flash drive.

3 8. Woodhouse Exhibit I is cited once in Plaintiffs' filing. It is cited in Plaintiffs' Expert  
 4 Dr. Choffnes's declaration (ECF 659-3), for the proposition: "As described in my prior Declaration  
 5 in Support of Plaintiffs' Administrative Motion Requesting Leave to Obtain Limited Additional  
 6 Discovery, Dkt. 654-1, in April, 2025, Meta produced tens of thousands of log files from Guillaume  
 7 Lample's LibGen torrenting in 2022 and 2023." (ECF 659-3 ¶ 9, n. 10 (citing to Stein Decl. Ex.  
 8 11 [sic], Meta\_Kadrey\_00238128).)<sup>1</sup> Meta does not request that this statement, or any part of the  
 9 Choffnes Declaration, be sealed.

10 9. **Meta's Third-Party Relationship Information.** Meta respectfully requests the  
 11 Court's permission to redact limited portions of **Woodhouse Exhibit H** that reflect confidential  
 12 third-party identities subject to nondisclosure obligations, as well as sensitive and nonpublic  
 13 information concerning Meta's business strategies and negotiations vis-à-vis third parties  
 14 (including Meta's internal considerations regarding possible strategic partnerships). Disclosure of  
 15 third-party identities and agreement terms subject to non-disclosure obligations would put the third  
 16 parties' confidential information at risk and pose a competitive disadvantage to Meta and the third  
 17 parties who obtained promises of confidentiality from Meta for this information and who are not  
 18 parties to this lawsuit. Meta further respectfully requests the Court's permission to redact limited  
 19 portions of **Woodhouse Exhibits A-D** that reflect pricing information that is highly confidential to  
 20 both Meta and Amazon, which provides AWS services to Meta and subject to confidentiality and  
 21 non-disclosure obligations. Disclosure of this pricing information subject to non-disclosure  
 22 obligations would put Amazon and Meta's confidential information at risk and pose a competitive  
 23 disadvantage to Meta and the third parties who obtained promises of confidentiality from Meta for  
 24 this information and who are not parties to this lawsuit. Meta has limited its proposed redactions  
 25 to those necessary to mitigate the aforementioned harms, while maintaining the public's access to

26  
 27 <sup>1</sup> I am attempting to understand Plaintiffs' citations, which appear to have typographical errors in  
 28 them. As Stein Decl. Exhibit 11 is not Meta\_Kadrey\_00238128, Meta assumes based on context  
 that the Bates number included in this cite is correct and thus should refer to Stein Decl. Exhibit  
 12, not 11. Stein Decl. Exhibit 11 (Woodhouse Exhibit H) is a document bearing Bates No.  
 Meta\_Kadrey\_00089791 and does not relate to logs for Mr. Lample's activities.

1 information with potential relevance to the merits of the case. Meta has previously sought to file  
2 **Woodhouse Exhibit H** with the same redactions proposed here, (ECF 391-1 ¶¶ 3-6, ECF 391-8),  
3 which the Court granted (ECF 393).

4 10. **Meta's Highly Confidential Technical Information.** Meta respectfully requests  
5 the Court's permission to redact limited portions of **Woodhouse Exhibit J** that reflect Meta's  
6 nonpublic source code. Meta treats its source code with a high degree of security, and public  
7 disclosure of its source code would expose Meta to competitive harm. Accordingly, maintaining  
8 the confidentiality of source code information is critical to Meta's business and Meta treats this  
9 information as highly confidential. Meta has previously requested to seal documents based on  
10 similar technical information, and trade secret information pertaining to its generative AI offerings,  
11 (e.g., Dkt. 266-1 ¶ 6), which this Court has granted, (e.g., Dkt. 317 (granting Dkt. 266)).

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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Executed in San Jose, California on this 18th day of December 2025.

4  
5   
6 Michelle Woodhouse